

USDA PRIVACY IMPACT ASSESSMENT FORM

Project Name: Integrated Program Accounting System (IPAS)

Description of Your Program/Project: IPAS, FNS' Integrated Program Accounting System, is our mission critical financial management system that was implemented in May 2001 using the BearingPoint (formerly KPMG Consulting) *Performance Series* COTS client server software that was developed in 2000. IPAS is the last in a series of software upgrades to our original accounting system developed in the mid 1970's. The basic data and operational requirements remain virtually unchanged from that period, but the technology supporting this function has been upgraded over the years to incorporate improved database, server, telecommunications, and COTS software requirements.

DATA IN THE SYSTEM

<p>1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.</p>	<p>Customer</p> <ul style="list-style-type: none">- Information on program grantees (States, local agencies, and Indian Tribes), retailers, and program operators include general information such as grantee name, contact name, address, telephone number, financial information such as obligation, payable and receivable data, and either EIN or SSN data (as required by the Treasury Department in order to make or receive payments).- No individual recipient names or information is collected. <p>Employee</p> <ul style="list-style-type: none">- Information on employees is limited to their name, user id, office, and related security privileges for access to various system functions.
<p>2a. What are the sources of the information in the system?</p>	<p>Sources of information come from three categories:</p> <ol style="list-style-type: none">1. Data input by the FNS users that derives from submitted forms, invoices, and other financial documents gathered by the user.2. Data received from other systems or processors of data. IPAS receives draw-down data from the Treasury ASAP system, authorization information

	from our AMA system operated at the Federal Reserve, and other various payment information from Treasury.
2b. What USDA files and databases are used? What is the source agency?	None.
2c. What Federal Agencies are providing data for use in the system?	Treasury and the Federal Reserve of Richmond.
2d. What State and Local Agencies are providing data for use in the system?	All State and local agency data entered into IPAS comes directly through the Treasury ASAP system.
2e. From what other third party sources will data be collected?	State Food Stamp redemption data comes from EBT processors via the Treasury ASAP system. Retailer claims data and other receivables are established from court orders or administrative hearings.
2f. What information will be collected from the customer/employee?	No data is collected from employees. Customer data is related to the dollar amount of grants issued and the obligations, payables and receivables established through the course of program operations.
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	Reconciliations are done between the data in IPAS and the Treasury ASAP system.
3b. How will data be checked for completeness?	Automated edit checks are performed before data can be posted into the IPAS system.

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	The primary users of the system are FNS employees with a need to access the information. These users are generally segregated into those with the ability to enter data and those that have read only access.
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	Access to the system will follow FNS existing processes using the form 674.
3. Will users have access to all data on	Access to the system will be granted to classes of users and to users individually.

the system or will the user's access be restricted? Explain.	
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	Access to IPAS functions and screens are controlled by the user class security feature established for each system user. This controls what data can be access and what functions the user can perform.
5a. Do other systems share data or have access to data in this system? If yes, explain.	Data from IPAS is shared with STARS II.
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	FNS security officers.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	Transaction level data is not shared with any other agency.
6b. How will the data be used by the agency?	The data is used to support the financial operations of the Agency and the grants administration of the programs.
6c. Who is responsible for assuring proper use of the data?	FNS' Accounting Division under established security procedures.

ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes.
2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	No.
2b. Will the new data be placed in the individual's record (customer or employee)?	No.
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	Yes.
2d. How will the new data be verified for relevance and accuracy?	No new data is derived.
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	<ul style="list-style-type: none"> - Physical access to the servers is protected by FNS policy and procedures. - Electronic access to the servers is protected by FNS/USDA firewalls and network security. - The application is protected by authorization and authentication at the application level. - Intrusion detection devices will monitor the servers that are available to the public.
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	n/a.
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	The data will be retrieved by searches and reports based on various search criteria including personal identifiers. Searches and reports are developed by FNS employee for their workload management and supervision.
4b. What are the potential effects on the	There are no effects on customers and employees due process rights.

<p>due process rights of customers and employees of:</p> <ul style="list-style-type: none"> • consolidation and linkage of files and systems; • derivation of data • accelerated information processing and decision making; • use of new technologies. 	
4c. How are the effects to be mitigated?	n/a

MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	This is an accounting system used to establish program grants and provide obligation, payable and receivable data for each grantee, retailer, and program operator.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	Not applicable.
2b. Explain any possibility of disparate treatment of individuals or groups.	None.
2c. What are the retention periods of data in this system?	Direct data entry in the system is from 2002, with some historical consolidated data incorporated into the system for open obligations.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	IPAS procedures are documented.
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The data maintained in IPAS is transaction level data that has been reviewed and audited by the USDA OIG on an annual basis.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	No.
3b. How does the use of this technology	n/a

affect customer/employee privacy?	
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	No.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No.
4c. What controls will be used to prevent unauthorized monitoring?	n/a
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	n/a
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	n/a